

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

MIRLINDA ELMAZI, on behalf of herself and all others similarly situated,

Plaintiff,

v.

DSM-FIRMENICH AG, FIRMENICH INTERNATIONAL SA, FIRMENICH INC., AGILEX FLAVORS & FRAGRANCES, INC., GIVAUDAN SA, GIVAUDAN FRAGRANCES CORP., GIVAUDAN FLAVORS CORP., UNGERER & COMPANY, INC., CUSTOM ESSENCE INC., INTERNATIONAL FLAVORS & FRAGRANCES INC., SYMRISE AG, SYMRISE INC., AND SYMRISE US LLC,

Defendants.

CIVIL ACTION NO: 23-CV-16127

**DECLARATION IN SUPPORT OF
PLAINTIFFS' MOTION TO
CONSOLIDATE RELATED CASES
PURSUANT TO FED.R.CIV.P. 42(A)
AND APPOINT INTERIM CO-
LEAD COUNSEL PURSUANT TO
FED.R.CIV.P. 23(G)**

YVONNE PEYCHAL, on behalf of herself and all others similarly situated,

Plaintiff,

v.

DSM-FIRMENICH AG, FIRMENICH INTERNATIONAL SA, FIRMENICH INC., AGILEX FLAVORS & FRAGRANCES, INC., GIVAUDAN SA, GIVAUDAN FRAGRANCES CORP., GIVAUDAN FLAVORS CORP., UNGERER & COMPANY, INC., CUSTOM ESSENCE INC., INTERNATIONAL FLAVORS & FRAGRANCES INC., SYMRISE AG, SYMRISE INC., AND SYMRISE US LLC,

Defendants.

CIVIL ACTION NO: 23-CV-16242

Related Action

DECLARATION OF KELLIE LERNER

KELLIE LERNER, ESQ., of full age, hereby declares under penalty of perjury as follows:

1. I am an attorney licensed to practice in New Jersey and am a partner at Robins Kaplan LLP, counsel for Plaintiff Mirlinda Elmazi, in the above matter. I make this declaration in support of Plaintiffs' Motion to Consolidate Related Cases Pursuant to Fed.R.Civ.P. 42(a) and Appoint Interim Co-Lead Counsel Pursuant to Fed.R.Civ.P. 23(g).

2. Attached as Exhibit 1 of this Declaration is the Firm Resume of Robins Kaplan LLP.

3. Attached as Exhibit 2 to this Declaration is the Firm Resume of Freed Kanner LLC.

I hereby declare under penalty of perjury that the foregoing is true and correct.

Dated: September 6, 2023

/s/ Kellie Lerner
Kellie Lerner